AGC

AGC Flat Glass North America, Inc.
Greenland Plant
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Church Hill, TN 37642
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March 18, 2013

Mrs. Christina Morgan
Tennessee Department of Environmental and Conservation
Division of Water Pollution Control
401 Church Street 6th Floor L&C Annex
Nashville, TN 37243-1534

RE: Compliance Evaluation Inspection
Storm Water Non-Construction Non-Sampling Inspection AGC Flat Glass North America - Greenland Plant NPDES Permit TN0002631
Tennessee Storm Water Multi-Sector General Permit for Industrial Activities (TMSP) TNROS 1221

Dear Mrs. Morgan:

This letter is to address the findings from a recent inspection and to submit to the division a plan to rectify each finding.

l. Monthly Discharge Monitoring Reports (DMRS) submitted to the division show numerous violations of the Total Phosphorus limitations specified in NPDES permit Part I A. for internal outfall 001. Facility efforts toward identifying the cause and resolving the violations must continue.

- Action plan – A process has been established and is being maintained where all mop water from the janitorial staff is containerized, sampled by an outside lab, then sent offsite for disposal. We have also conducted numerous random sampling both internal and external locations at the facility to try and determine the source of the phosphorus. We will continue to look and test for the possible source. ONGOING

2. No sign was in place at internal outfall 002. An outfall sign meeting the requirements of permit Part III C. must be placed and maintained at each facility outfall.

- Action plan – A sign has been installed at each outfall. COMPLETE - 3/2/2013

3. The individual primarily responsible for laboratory analyses performed onsite, Mr. Paul McKenzie, indicated that he taps the outside of the Imhoff cone after 45 minutes during settleable solids tests. This is not consistent with the procedures in Standard Method 2540 F-1997, which specify gentle agitation of the sample near the sides of the cone with a rod or by spinning. Analyses must be performed in accordance with methods prescribed in Title 40 CFR Part 136 as required by NPDES permit Part I B_3.

- Action plan – Identified issues have been corrected and will be performed in accordance with the regulations and the standard method as required by our permit. COMPLETE – 3/4/2013

4. Mr. McKenzie indicated that temperature readings for outfall 004 effluent were performed using the thermometer in the pH meter and probe in the onsite laboratory. However, he indicated the calibration of this equipment had not been checked against a NIST-certified precision thermometer in some time. Standard Method 2550 B-2000 requires periodic checks. Analyses must be performed in accordance with methods prescribed in Title 40 CFR Part 136 as required by NPDES permit Part I B.3.

- Action plan – Identified issues have been corrected and will be performed in accordance with the regulations and the standard method as required by our permit. Instruments will be calibrated by an outside vendor, and a PM program for regular calibration of equipment will be established and documented to insure compliance. All records will be maintained. OPEN: COMPLETION DATE - 5/31/2013

5. The equipment used for dissolved oxygen (D.O.) readings at internal outfall 002 is calibrated using barometric pressure. However, the barometer used onsite had not been calibration checked and certified in an indeterminate period of time. If this type of calibration is to be employed for D.O. measurement equipment, a certified barometer must be used to obtain the readings. Also note that such D.O. meter calibrations must be based on uncorrected local barometric pressure rather than corrected (to sea level) readings. Further, documentation of the barometric pressure and meter reading should be maintained. Analyses must be performed in accordance with methods prescribed in Title 40 CFR Part 136 as required by NPDES permit Part I B3., and records must be kept in accordance with Part I B_4. Proper equipment operation and maintenance is required by Part II A.4.

- Action plan – Identified issues have been corrected and will be performed in accordance with the regulations and the standard method as required by our permit. Instruments will be calibrated by an outside vendor, and a PM program for regular calibration of equipment will be established and documented to insure

compliance. All records will be maintained. OPEN: COMPLETION DATE – 5/31/2013

6. No records were available during the inspection to document calibration check of the internal outfall 002 flow measurement equipment in some time. Mr. McKenzie indicated the equipment likely had not been checked in over a year. F low equipment (e. g., v-notch Weir, ultrasonic level sensor, and associated electronics) must be checked for proper placement and calibration in order to ensure acceptable measurement accuracy. Accurate flow reporting is necessary for compliance with NPDES permit Part I A., and proper equipment operation and maintenance is required by Part II A.4. The flow calculation and totalizer system must be included in these checks. Such checks should be performed at least annually.

- Action plan - Instruments will be calibrated by an outside vendor, and a PM program for regular calibration of equipment will be established and documented to insure compliance. All records will be maintained. OPEN: COMPLETION DATE – 5/31/2013

7. Mr. McKenzie indicated that flow level measurements for internal outfall 001 are obtained at the v-notch Weir plate and those for outfall 004 are sometimes obtained at the downstream end of the converging section of the flume. Based on available flow measurement references such as the Isco Open Channel Flow Measurement Handbook, 6th Edition, neither of these measurement locations is appropriate for the types of primary devices (i. e., Weir and flume) in place at these outfalls. Flow level readings should be made at appropriate locations in order to ensure acceptable accuracy of flow reporting. Accurate flow reporting is necessary for compliance with NPDES permit Part I A.

- Action plan - All required testing will be performed in accordance with the regulations and the standard method as required by our permit. All records will be maintained. A copy of Isco Open Channel Flow Measurement Handbook has been purchased to assist us in identifying the correct location for flow level readings. OPEN: COMPLETION DATE – 5/31/2013

8. In part, TMSP Sector E requires identification of exposed materials, potential pollutant sources, and identification and implementation of appropriate control measures to minimize contact of materials to and mobilization in storm water runoff. The SWPPP notes the presence of cullet and raw materials onsite and indicates little to no risk of storm Water contamination, but does not appear to address the potential for solids mobilization in storm Water runoff. Inspection of the site revealed the presence of substantial amounts of cullet, aggregate, and other raw materials stored outside or spilled into locations where they may be mobilized in storm water runoff from the facility. An apparent storm drain outside the HT3 loading dock was nearly full of

sediment at the time of this inspection, and mobilized material from numerous cullet piles was noted around the site. Thus, existing control measures and procedures do not appear to be effective in controlling discharge of solids in storm Water runoff from the site. The SWPPP and identified control measures and procedures must be modified to adequately address the requirements of TMSP TNR051221.

- Action plan – Storm water plan along with control measures have been updated to address the need to control solids. Drain at loading dock will be cleaned out of debris. SWPPP - COMPLETE – 3/5/2013

  Drain – OPEN: COMPLETION DATE – 5/31/2013

9. The facility storm water pollution prevention plan (SWPPP) indicates employee training will be performed annually. No records were available during this inspection to document that the training had been performed as required by TMSP Part 11.E.3.2.3.5 since August 2010. Records for December 2011 were provided after the onsite inspection, but included only a limited number of personnel. Training of all facility personnel involved in storm water pollution prevention must be performed in accordance with permit requirements.

- Action plan – Storm water training will be expanded to include maintenance and cullet line personnel, and documented to ensure compliance. OPEN: COMPLETION DATE – 4/30/2013

10. Propane and bulk lubricant drums are stored in a diked concrete containment area in front of the main plant. Runoff from this area enters a sump and is to be inspected for possible contamination before draining. At the time of inspection, the drain valve on the piping from the sump was open and unattended. Thus, the containment effectiveness of this area was compromised, and potential existed for contamination of storm water runoff and the surrounding area. Also, there was some evidence of spillage in an adjacent chemical storage building, but the material did not appear to have exited the building.

- Action plan – Will re-train employee(s) responsible for conducting this PM. All records will be documented to ensure compliance. COMPLETE – 3/1/2013

If you have any questions concerning this reply, please contact me at (423) 357-2487.

Sincerely,

Steven Rolfe
Environmental Manager
Cc: B. Carter TDEC Water Pollution Control/Johnson City